

1 **BRUNO W. TARABICHI**, CA State Bar No. 215129

bruno@legalforcelaw.com

2 **HEATHER R. NORTON**, CA State Bar No. 257014

heather@legalforcelaw.com

3 **ROY MONTGOMERY**, CA State Bar No. 279531

roy@legalforcelaw.com

4 **LEGALFORCE RAJ ABHYANKER, P.C.**

1580 W. El Camino Real, Suite 13

Mountain View, California 94040

Telephone: 650.965.8731

6 Facsimile: 650.989.2131

7 Attorneys for Defendant

Raj Abhyanker

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 NEXTDOOR.COM, INC., a Delaware
12 corporation,

13 Plaintiff,

14 vs.

15 RAJ ABHYANKER, an individual,

16 Defendant.

17 RAJ ABHYANKER, an individual

18 Counterclaimant,

19 vs.

20 NEXTDOOR.COM, INC., a Delaware
21 corporation; PRAKASH
22 JANAKIRAMAN, an individual;
23 BENCHMARK CAPITAL PARTNERS,
24 L.P., a Delaware limited partnership;
25 BENCHMARK CAPITAL
26 MANAGEMENT CO. LLC, a Delaware
27 limited liability company; SANDEEP
28 SOOD, an individual; MONSOON
ENTERPRISES, INC., a California
corporation, and DOES 1-50, inclusive;

Counterdefendants.

Case No. 3:12-cv-05667-EMC

**DECLARATION OF RAJ ABHYANKER
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

1 I, RAJ ABHYANKER, declare as follows:

2 1. I am the Defendant and Counterclaimant in this lawsuit. I make this Declaration in
3 support of Nextdoor.com, Inc. and Prakash Janakiraman's Administrative Motion to Seal Exhibits
4 B, C, D, and E to the Declaration of Jennifer L. Kelly (Doc. 166-1), filed on February 27, 2014.
5 The matters set forth herein are of my own personal knowledge, and if called upon to testify as to
6 such matters, I could and would do so.

7 2. Exhibits B, C, D, and E to the Kelly Declaration consist of materials from the Due
8 Diligence CD that I provided to Benchmark in 2007. The CD was produced as "attorney's eyes
9 only" in this litigation.

10 3. I understand that at the Case Management Conference on December 12, 2013,
11 Counsel for Nextdoor.com agreed to treat the CD as "attorney's eyes only," if it were to be
12 produced in this action.

13 4. I provided that CD to Benchmark only after Benchmark agreed to maintain its
14 confidentiality. The CD was marked "confidential."


15 5. The materials that constitute Exhibits B, C, D, and E include business development
16 plans and strategies, including advertising and promotion ideas and plans, and mock-ups of
17 webpages. That information has not been made available to the general public. It has only been
18 provided confidentially to persons who were subject to non-disclosure agreements.

19 6. I would be harmed if that information were to be made public. I am in the process
20 of re-building and re-launching Fatdoor. The confidential information in the CD that I provided
21 to Benchmark, is relevant to my Fatdoor re-launch.

22
23 I declare under penalty of perjury under the laws of the State of California that the
24 foregoing is true and correct.

25 Executed March 4, 2014 at Mountain View, California.

26
27 Signed


Raj Abhyanker 3/4/14